THE HONORABLE BRIAN D. LYNCH 1 **CHAPTER 13 HEARING DATE: February 4, 2020** 2 **HEARING TIME: 1:00 P.M. LOCATION: Vancouver, Washington** 3 4 5 6 7 8 9 IN THE UNITED STATES BANKRUPTCY COURT FOR THE 10 WESTERN DISTRICT OF WASHINGTON AT TACOMA 11 12 In re: Case No.: 18-44220-BDL 13 MARK DANIEL HOUSE and TRUSTEE'S RESPONSE TO DEBTORS' MOTION TO MODIFY CHAPTER 13 PLAN CHRYSTAL MARIE HOUSE, 14 FILED 1/2/2020 Debtors. 15 16 **COMES NOW**, Michael G. Malaier, Chapter 13 Standing Trustee, and responds to 17 Debtors' Motion to Modify Chapter 13 Plan Filed 1/2/2020 ("Motion") (ECF No. 38), as 18 follows: 19 **BACKGROUND** 20 Debtors filed this Chapter 13 case on December 18, 2018. The applicable commitment 21 period is sixty months. The case is currently in the fourteenth month. The bar date for filing 22 non-governmental claims was February 26, 2019. Filed unsecured claims total \$132,357.99. 23 Debtors propose to pay at least \$0 to allowed nonpriority unsecured claims. 24 25 Michael G. Malaier

Michael G. Malaier Chapter 13 Standing Trustee 2122 Commerce Street Tacoma, WA 98402 (253) 572-6600

## **RESPONSE** 1 Schedules or other documentation insufficient: Debtor must provide evidence of the 2 claimed additional medical expenses. 3 4 **WHEREFORE**, Trustee requests that the Motion be denied. 5 **DATED** this 27th day of January 2020. 6 7 8 /s/ Matthew J.P. Johnson Matthew J.P. Johnson, WSBA# 40476 for 9 Michael G. Malaier, Chapter 13 Trustee 10 11 12 **CERTIFICATE OF MAILING** 13 I certify under penalty of perjury under the laws of the United States that on January 27, 2020, I 14 caused to be mailed via first class mail a true and correct copy of the Trustee's Response to Debtors' Motion to Approve Amended Chapter 13 Plan to the following: 15 Mark Daniel House 16 Chrystal Marie House 191 Curtis Drive 17 Longview WA 98632 18 The following parties received Trustee's Response to Debtors' Motion to Approve Amended Chapter 13 Plan via ECF: 19 Ellen Ann Brown 20 Michael H. Hekman Nikole Montufar 21 United States Trustee 22 Executed at Tacoma, Washington this 27th day of January, 2020. 23 /s/ Ruth Wilson 24 Motion Coordinator for Michael G. Malaier, Chapter 13 Trustee 25

Michael G. Malaier Chapter 13 Standing Trustee 2122 Commerce Street Tacoma, WA 98402 (253) 572-6600